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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Abilio Hernandez, v. Allied Collection Services, Inc., Defendant.	Case No.: 2:19-cv-00291-JCM-VCF Stipulation of facts and conclusions of law and to withdraw motions [ECF Nos. 18, 20]
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Abilio Hernandez (“Plaintiff”) and Allied Collection Services, Inc. (“Defendant”), by and through their respective counsel, hereby stipulate to the following facts and conclusions of law, to bind the parties in this case:

1. Defendant is a debt collector under the FDCPA, as applicable to this case;
2. Plaintiff is a consumer under the FDCPA, as applicable to this case;
3. The debt is “debt” under the FDCPA, as applicable to this case; and
4. The lien document at issue in this case did not contain any judge’s signature.

It is further stipulated that Plaintiff will not rely on any matters deemed admitted due to Defendant's untimely responses to his requests for admission, as argued in Plaintiff's motion for summary judgment, ECF No. 18. Therefore,

1 Defendant's motion for an order withdrawing the admissions is withdrawn as it is
2 moot. The Parties therefore stipulate that:

3 (1) Plaintiff's motion for summary judgment, ECF No. 18, is withdrawn
4 without prejudice; and
5 (2) Defendant's motion for an order withdrawing admissions under FRCP
6 36(b), ECF No. 20, is withdrawn without prejudice.

7 DATED this 25th day of July 2019.

8 **KAZEROUNI LAW GROUP, APC**

9 By: /s/ Michael Kind
10 Michael Kind, Esq.
11 6069 South Fort Apache Road, Suite 100
12 Las Vegas, Nevada 89148
13 *Attorneys for Plaintiff*

14 **CARLSON & MESSER LLP**

15 By: /s/ J. Grace Felipe
16 J. Grace Felipe, Esq.
17 5901 W. Century Boulevard, Suite 1200
18 Los Angeles, California 90045
19 *Attorneys for Defendant Allied Collection Services, Inc.*

20 IT IS SO ORDERED:
21 
22 Dennis C. Mahan
23 UNITED STATES DISTRICT JUDGE

24 DATED: July 29, 2019
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on July 25, 2019, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

Michael Kind

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